BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, D.C. 20554

In the Matter of))
Applications of AT&T Inc. and Atlantic Tele-Network, Inc. for Consent to the Transfer of Control of Licenses and Authorizations held by Atlantic Tele-Network, Inc. and Its Subsidiaries) WT Docket No. 13-54))))

SUPPLEMENTAL RESPONSE OF ATLANTIC TELE-NETWORK, INC. TO INFORMATION AND DISCOVERY REQUEST DATED JUNE 5, 2013

July 5, 2013

In response to the letter dated June 5, 2013 from Ruth Milkman, Chief of the Wireless Telecommunications Bureau, and to the accompanying Information and Discovery Request for Allied (the "Information Request"), Allied Wireless Communications Corporation and Atlantic Tele-Network, Inc. (collectively, "ATN") provide the following supplemental information and responsive documents, as applicable.

ATN is producing responsive documents, subject to the qualifications stated in its June 19, 2013 Response, based on a search and review of electronic and hard copy materials collected from the twelve agreed upon custodians, and has supplemented that collection from other ATN sources as appropriate. ATN employed relatively broad search terms¹ to identify a subset of documents that were reviewed for relevance, confidentiality, and privilege, and also reviewed documents identified independently of the search terms.² Exhibit B describes the deduplication methodology employed by ATN and its document production vendor. ATN believes that this submission completes its response to the twelve items listed in the Information Request.

As stated in ATN's June 19, 2013 Response, any inadvertent inclusion of material subject to the attorney-client, attorney work-product, or other applicable privilege does not constitute a waiver of that privilege. ATN requests the return or destruction of all confidential material at the conclusion of this proceeding.

The search strings used to identify the documents for review are provided in Exhibit A.

² For those requests seeking "all documents" for which ATN is producing family members of responsive documents, ATN designated the entire family of documents with the highest confidentiality level associated with any document in the family.

Respectfully submitted,

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Dated: July 5, 2013

EXHIBIT A Search Terms

Item	(sub)	Search Terms
2	a	(customer! or subscriber!) AND (view! or see or saw or think or thought or believe! or
		belief!) AND ("network quality" or coverage or "service plans" or pricing or
		promotions) and (ATN or Allied or Alltel or ANT or Aspen)
		(Level! or reason!) /10 churn
2	b(i)	(Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile)
		AND (Allied or ATN or Alltel or ANT or Aspen) AND compet!
2	b(ii)	(Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile)
		AND (Allied or ATN or Alltel or ANT or Aspen) AND (compet! or response or "new
		product" or pricing or promotion! or "retail locations" or "service offerings" or
		coverage)
		(Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile)
		AND (Allied or ATN or Alltel or ANT or Aspen) and (network or technology) /3
		upgrade!))
		wp8.4447))
		(Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile)
		AND (Allied or ATN or Alltel or ANT or Aspen) AND (compet! or response or "new
		product" or pricing or promotion! or "retail locations" or "service offerings" or
		coverage) AND Verizon
		(Competitor! or AT&T or Aardvark or Thomas or Verizon or Sprint or T-Mobile)
		AND (Allied or ATN or Alltel or ANT or Aspen) and (network or technology) /3
	1 (***)	upgrade!)) AND Verizon
2	b(iii)	(spectrum /3 ((need or exhaust) or (capacity /3 constrain!))) or (("joint venture" or
2		merger) /10 spectrum)) or ((purchase or lease) /10 spectrum)
3 4		(4G or LTE or HSPA) /10 (introduce! or limit! or technology or plan!)
4	a	(Upgrade or build! or expand or improve) AND (Alltel or Allied) AND (market! or network! or service! or phone! or device!)
6	a	((subscriber! or customer!) /10 (distribut! or geography)) or (data /3 (use or usage)) or
0	а	((roaming /3 cost) /5 (increment! or extra or margin!))
7		"dropped call!" or (loss /3 signal) or churn or (network /3 quality) or ((poor or low or
,		bad) /3 edge) or (handoff /3 (difficult! or hard or problem))
8	a	expens! /20 (geograph! or disperse or "spread out" or diverse)
8	b	(effort or try or tried or attempt!) /10 (smartphone or "new device!" or iphone or
		galaxy)/10 (obtain or secure or buy or contract or deal)
L		

EXHIBIT B

Description of Deduplication Process Employed for the Document Production

Pursuant to Instruction for Submission of Electronic Documents No. C.6(b)(iii), ATN provides the following description of the deduplication methodology it has employed for the document production:

"Other ESI" type files have an MD5 digest value calculated by processing software nuix during ingestion. The results of this calculation are a string of hexadecimal characters representing the MD5 hash value for the "Other ESI" file. This MD5 Hash string value is stored in a table. Further, each subsequently extracted parent level "Other ESI" file is also hashed using the previously mentioned methodology, then compared against the database of existing MD5 hash values to determine if the newly extracted file is distinct. If the file is not distinct it is not extracted, but instead receives a value in the selection table field that reflects the item of which the current record is a duplicate.

"Email/Calendar Item" types are opened and the specified metadata text values have an MD5 digest value calculated by processing software nuix during ingestion. The results of this calculation are a string of hexadecimal characters representing the MD5 hash value of the bytes derived from the combined metadata text values of the mentioned "Email/Calendar Item" file. This MD5 Hash string value is stored in a table. Further, each subsequently extracted parent level "Email/Calendar Item" file is also hashed using the previously mentioned methodology, then compared against the database of existing MD5 hash values to determine if the newly extracted file is distinct. If the file is not distinct it is not extracted, but instead receives a value in the selection table field that reflects the item of which the current record is a duplicate.

To derive a full list of custodians for each record, the selection table is queried for a list of items that are duplicative of the first item extracted and exported for review. The custodian values are then pulled for each of the items in this list and provided as a Custodian field representing all of the custodians that were found to possess a distinct item, with semicolon delineation.

All deduplication actions occur against compound documents. In other words, if the parent hash matches a hash in the table, then the entire compound document is suppressed from extraction. Children items are evaluated for deduplication along with parent items, so that only compound documents with duplicate hash matches throughout are deduplicated.

Email fields available to be included as variables in the MD5 hashing algorithm:

- Subject Header, From Header, To Header, Cc Header, and Bcc Header.
- We include the body text tokenized whitespace and irrelevant characters.
- Binary streams are created to capture and hash attachments.